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BY ECF

June 24, 2019

Honorable Katharine H. Parker
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Vazquez et al v. CookUnity, LLC et al;
18-cv-09301-AJN

Your Honor:

I am an attorney for Plaintiffs in the above-referenced matter. I write Pursuant to The Court's Order and request one week to file a motion for a pre-motion conference to amend the complaint.

The parties are unable to submit a stipulation because the terms of the stipulation are not agreed upon by the parties. Additionally, Plaintiffs believe they continue to have FLSA tools of the trade and minimum wage claims. *Ortega v. JR Primos 2 Rest. Corp.*, No. 15 Civ. 9183 (JCF), 2017 U.S. Dist. LEXIS 93178, 2017 WL 2634172, at *3 (S.D.N.Y. June 16, 2017)("Under the FLSA, an employer may not shift the cost of purchasing 'tools of the trade' to an employee if 'the cost of such tools cuts into the minimum or overtime wages required to be paid him under the FLSA'"). Plaintiffs plan on amending the complaint to specifically delineate the equipment costs at issue. Thus, we respectfully request one week to submit our motion for a pre-motion conference to amend the complaint with the amended complaint attached to the motion.

/s/ Michael Faillace

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Attorneys for Plaintiffs